



NEIL H. GREENBERG
& ASSOCIATES, P.C.
COUNSELORS AT LAW

4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

NEIL H. GREENBERG, ESQ.

CATALINA ROMAN

JUSTIN M. REILLY, ESQ.

ROSA COSCIA

HEATHER BABIONE, ESQ.

PARALEGAL

KEITH E. WILLIAMS, ESQ.

January 19, 2017

VIA: ECF filing

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-9014

RE: Drouillard v. Sprint/United Management Company
16 CV 00624 (ADS) (AKT)

Dear Judge Tomlinson:

Kindly accept this correspondence as the parties' Discovery Status Report.

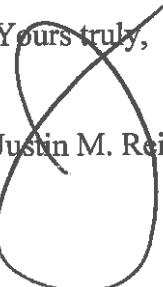
Plaintiff has responded to defendant's document demands and interrogatory requests and has certified her interrogatory responses as to their accuracy and completeness. Defendant has responded to plaintiff's interrogatory requests and document demands and has verified its interrogatory responses. There are no outstanding objections to the parties' responses and no outstanding discovery disputes. The parties are still conferring concerning the production of plaintiff's analyses of her alleged "off the clock work" that she testified to at her deposition.

Plaintiff gave sworn deposition testimony on November 29, 2016. Plaintiff's District Manager, Kenneth McQuiller, appeared for a deposition on January 17, 2017. Plaintiff's Store Manager, Burak Tohumcu, is confirmed to give deposition testimony on February 21, 2017. Plaintiff also intends to take the depositions of other Store Managers, a former Regional Manager, and Sarah King, a Human Resources Manager. These depositions have yet to be scheduled because at the last conference, the Court issued an Order stating that further discovery would be stayed until plaintiff's motion for conditional certification is decided [D.E. 41]. Additionally, if the Court grants plaintiff's motion for conditional certification, defendant intends on taking the depositions of the opt-in plaintiffs.

Given that plaintiff's motion for conditional certification is currently pending before the Court, the parties respectfully request that the Discovery Status Conference scheduled for January 24, 2017 be adjourned until after the Court's decision on plaintiff's motion.

This is the first request for an adjournment of this conference and all parties consent to the granting of this application.

Thank you for your time and attention to this matter.

~~Yours truly,~~
~~Justin M. Reilly~~


cc: Harris M. Mufson, Esq.